

1	MELINDA S. RIECHERT, State Bar No. 65504		
2	SHWETA GERA, State Bar No. 234627 MORGAN, LEWIS & BOCKIUS LLP		
	2 Palo Alto Square		
3	3000 El Camino Real, Suite 700 Palo Alto, CA 94306-2122		
4	Telephone: 650.843.4000 Facsimile: 650.843.4001		
5	E-mail: mriechert@morganlewis.com; sgera@morganlewis.com		
6	Attorneys for Defendant		
7	INFOSÝS TECHNOLOGIES LIMITED		
8	CHRISTOPHER P. THORMAN, State Bar No. 0056013 PETER HARDIN-LEVINE, State Bar No. 0014288		
9	MARK GRIFFIN, State Bar No. 0064141 THORMAN & HARDIN-LEVINE CO., L.P.A.		
10	The Bradley Building		
11	1220 West Sixth Street, Suite 207 Cleveland, OH 44113		
12	Telephone: 216.621.9767/Facsimile: 216.621.3422		
13	E-mail: cthorman@thllaw.com; plevine@thllaw.com; mgriffin@thllaw.com		
14	KATHRYN BURKETT DICKSON, State Bar No. 70636		
	180 Grand Avenue, Suite 1300		
15	Oakland, CA 94612 Telephone: 510.318.7700/Facsimile: 510.318.7701		
16	E-mail: kathy@dicksonlevy.com		
17			
18	Attorneys for Plaintiff FRANK A. J. GONSALVES		
19		ES DISTRICT COURT	
20	NORTHERN DISTRICT OF CALIFORNIA		
21	SAN FRANCISCO DIVISION		
22			
23	FRANK A. J. GONSALVES,	Case No. 3:09-cv-04112 MHP	
24	Plaintiff,	JOINT STIPULATION AND [PROPOSED]	
25	vs.	ORDER TO EXTEND DEADLINES	
	INFOSYS TECHNOLOGIES LTD.; and		
26	JOHN DOES I-X, inclusive,		
27	Defendants.		
28			

MORGAN, LEWIS &
BOCKIUS LLP
ATTORNEYS AT LAW
PALO ALTO

JOINT STIPULATION AND [PROPOSED] ORDER TO EXTEND DEADLINES (CASE NO.: 3:09-cv-04112 MHP)

Case 3:09-cv-04112-EMC Document 99 Filed 01/19/11 Page 2 of 3

1	WHEREAS, per the Court's Minutes dated September 22, 2010, the Court ordered that		
2	the parties complete mediation by January 18, 2011;		
3	WHEREAS, the parties are continuing to engage in limited discovery, including		
4	depositions and anticipate that discovery will take place up until April 2011;		
5	WHEREAS, the parties are working diligently to review and produce documents		
6	(including electronic documents on computer hard drives) and to schedule depositions, including		
7	depositions of very high-level company executives (such as the Chief Executive Officer and		
8	Chief Operating Officer of Defendant Infosys) in India;		
9	WHEREAS, the parties need additional time to complete depositions given schedule		
10	conflicts of counsel and witnesses;		
11	WHEREAS, the parties agree that mediation will be more productive if held after the		
12	completion of document production and depositions of key witnesses;		
13	WHEREAS, the parties will schedule a mediation session with mediator Jerome Weiss as		
14	soon as possible following depositions;		
15	WHEREAS, the parties believe that the Case Management Conference, currently		
16	scheduled for March 28, 2011, would be more efficient if held after the mediation;		
17	THEREFORE, the parties hereby stipulate, and request that the Court order, that the		
18	parties engage in mediation by June 30, 2011 and file a status statement regarding the outcome of		
19	private ADR by June 30, 2011. The parties also stipulate and request that the Court order that the		
20	Case Management Conference be continued to until after June 30, 2011.		
21			
22	Dated: January 18, 2011 MORGAN, LEWIS & BOCKIUS LLP		
23			
24	By /s/		
25	Melinda S. Riechert Shweta Gera		
26	Attorneys for Defendant INFOSYS TECHNOLOGIES LIMITED		
27			
28			
	JOINT STIPULATION AND (PROPOSED) ORDER		

MORGAN, LEWIS & BOCKIUS LLP
ATTORNEYS AT LAW
PALO ALTO

Case 3:09-cv-04112-EMC Document 99 Filed 01/19/11 Page 3 of 3

By /s/ Christopher P. Thorman Peter Hardin-Levine Mark Griffin Attorneys for Plaintiff FRANK A. J. GONSALVES Pursuant to Stipulation, the mediation deadline, currently scheduled for January 18, 2 is hereby continued until June 30, 2011. The parties shall file a status statement regarding th outcome of private ADR by June 30, 2011. The Case Management Conference currently set March 28, 2011 is hereby continued to _July 11, 2011. at 3:00 p.m. IT IS SO ORDERED. Dated:1/19, 2011 Dated:1/19, 2011 Judge Marilyn H. Patel			
By Christopher P. Thorman Peter Hardin-Levine Mark Griffin Attorneys for Plaintiff FRANK A. J. GONSALVES By IPROPOSEDI ORDER Pursuant to Stipulation, the mediation deadline, currently scheduled for January 18, 2 is hereby continued until June 30, 2011. The parties shall file a status statement regarding the outcome of private ADR by June 30, 2011. The Case Management Conference currently set March 28, 2011 is hereby continued to July 11, 2011. at 3:00 p.m. IT IS SO ORDERED. Dated:1/19, 2011 Dated:1/19, 2011			
Christopher P. Thorman Peter Hardin-Levine Mark Griffin Attorneys for Plaintiff FRANK A. J. GONSALVES Pursuant to Stipulation, the mediation deadline, currently scheduled for January 18, 2 is hereby continued until June 30, 2011. The parties shall file a status statement regarding th outcome of private ADR by June 30, 2011. The Case Management Conference currently set March 28, 2011 is hereby continued toJuly 11, 2011. at 3:00 p.m. IT IS SO ORDERED. Dated:1/19, 2011 Dated:1/19, 2011			
Mark Griffin Attorneys for Plaintiff FRANK A. J. GONSALVES Pursuant to Stipulation, the mediation deadline, currently scheduled for January 18, 2 is hereby continued until June 30, 2011. The parties shall file a status statement regarding th outcome of private ADR by June 30, 2011. The Case Management Conference currently set March 28, 2011 is hereby continued toJuly 11, 2011. at 3:00 p.m. IT IS SO ORDERED. Dated:1/19, 2011 JUNOP SORDERED PATEL Judge Marilyn H. Patel			
FRANK A. J. GONSALVES Pursuant to Stipulation, the mediation deadline, currently scheduled for January 18, 2 is hereby continued until June 30, 2011. The parties shall file a status statement regarding the outcome of private ADR by June 30, 2011. The Case Management Conference currently set March 28, 2011 is hereby continued toJuly 11, 2011. at 3:00 p.m. IT IS SO ORDERED. Dated:1/19, 2011 Dated:1/19, 2011 Dated:1/19, 2011 Dated:1/19, 2011			
Pursuant to Stipulation, the mediation deadline, currently scheduled for January 18, 2 is hereby continued until June 30, 2011. The parties shall file a status statement regarding th outcome of private ADR by June 30, 2011. The Case Management Conference currently set March 28, 2011 is hereby continued toJuly 11, 2011. at 3:00 p.m. IT IS SO ORDERED. Dated:1/19, 2011 Dated:1/19, 2011 DISTRICT OF CONTINUED PAPEL Judge Marilyn H. Patel			
Pursuant to Stipulation, the mediation deadline, currently scheduled for January 18, 2 is hereby continued until June 30, 2011. The parties shall file a status statement regarding th outcome of private ADR by June 30, 2011. The Case Management Conference currently set March 28, 2011 is hereby continued toJuly 11, 2011. at 3:00 p.m. IT IS SO ORDERED. Dated:1/19, 2011 Dated:1/19, 2011 Dated:1/19, 2011 District Or Experiment Conference currently set March 28, 2011 is hereby continued toJuly 11, 2011. at 3:00 p.m.			
is hereby continued until June 30, 2011. The parties shall file a status statement regarding the outcome of private ADR by June 30, 2011. The Case Management Conference currently set March 28, 2011 is hereby continued toJuly 11, 2011. at 3:00 p.m. IT IS SO ORDERED. Dated:1/19, 2011 Dated:1/19, 2011			
outcome of private ADR by June 30, 2011. The Case Management Conference currently set March 28, 2011 is hereby continued toJuly 11, 2011. at 3:00 p.m. IT IS SO ORDERED. Dated:1/19, 2011 Dated:1/19, 2011 Dated:1/19, 2011 Dated:1/19, 2011	Pursuant to Stipulation, the mediation deadline, currently scheduled for January 18, 2011,		
March 28, 2011 is hereby continued toJuly 11, 2011.at 3:00 p.m. IT IS SO ORDERED. Dated:1/19, 2011 Dated:1/19, 2011 Dated:1/19, 2011 Dated:1/19, 2011 Dated:1/19	ne		
12 IT IS SO ORDERED. Dated:1/19, 2011 Dated:1/19	t for		
13 IT IS SO ORDERED. 14 Dated:			
13 Dated:			
15 IT IS SO ORDERED PATEL 16 IT IS SO ORDERED PATEL 18 Judge Marilyn H. Patel 20 21 22 23 24 25			
16 17 18 19 20 21 22 23 24 25			
16 17 18 19 20 21 22 23 24 25			
18 19 20 21 22 23 24 25			
19 20 21 22 23 24 25			
20 21 22 23 24 25			
20 21 22 23 24 25			
22 23 24 25			
23 24 25			
24 25			
25			
20			
27			
28			

MORGAN, LEWIS & BOCKIUS LLP
ATTORNEYS AT LAW
PALO ALTO

DB2/22141375.1

JOINT STIPULATION AND [PROPOSED] ORDER TO EXTEND DEADLINES (CASE NO.: 3:09-cv-04112 MHP)